### DOCKET FILE COPY ORIGINAL THOMPSON HINE & FLORY LLP

RECEIVED

FEB 2 6 2001

#### Attorneys at Law

(614) 469-3246 •Thomas E. Lodge•tom.lodge@thompsonhine.com

FEDERAL OGMINICATIONS COMM OFFICE OF THE SECRETARY

February 26, 2001

Mr. Magalie Roman Salas Secretary Federal Communications Commission 445 12th Street, S.W, TW-A325 Washington, D.C. 20554

**VIA HAND DELIVERY** 

Attn: Common Carrier Bureau

Re:

In the Matter of Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, CC Docket No. 00-256

Dear Mr. Salas:

Enclosed for filing are an original and four (4) copies of Comments filed on behalf of the Ohio Telecommunications Industry Association in the above-referenced matter. Also enclosed are two (2) copies to be filed in each of the following dockets: Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Access Charge Reform for Incumbent Local Exchange Carriers Subject to Rate-of-Return Regulation, CC Docket No. 98-77, and Prescribing the Authorized Rate of Return for Interstate Services of Local Exchange Carriers, CC Docket No. 98-166.

Please acknowledge receipt of this transmittal by returning a date-stamped copy of the enclosed duplicate of the Comments in the self-addressed stamped envelope. An extra copy of the Comments is included for this purpose and is marked "Stamp and Receipt Copy."

In accordance with the Notice of Proposed Rulemaking released January 5, 2001, copies of this letter and the Comments on disk were also delivered on this date to the Competitive Pricing Division and to International Transcription Service, Inc., the FCC commercial contractor.

Please address any inquiries or further correspondence regarding this filing to my attention at Thompson Hine & Flory LLP, One Columbus, 10 West Broad Street, 7th Floor, Columbus, Ohio 43215-3435, telephone (614) 469-3246, or facsimile (614) 469-3361.

Yours very truly,

Thomas E. Lodge

Enclosure

Wanda Harris, Competitive Pricing Division (w/ disk) cc:

FCC Contractor, International Transcription Service, Inc. (w/disk) UAABCDE

Sheryl Todd, Accounting Policy Division

Na. of Copies rec'd Ot 10

249976

#### RECEIVED

FEB 26 2001

# Before the Federal Communications Commission Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers	) ) )	CC Docket No. 00-256	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45	
Access Charge Reform for Incumbent Local Exchange Carriers Subject to Rate-of-Return Regulation	) ) )	CC Docket No. 98-77	
Prescribing the Authorized Rate of Return For Interstate Services of Local Exchange Carriers	) ) )	CC Docket No. 98-166	

## COMMENTS OF THE OHIO TELECOMMUNICATIONSINDUSTRY ASSOCIATION

THE OHIO TELECOMMUNICATIONS INDUSTRY ASSOCIATION ("OTIA") is a trade association representing all of the local exchange telephone companies operating in the State of Ohio.

Many members of the OTIA are small and mid-size rural local exchange telephone companies, and many are likewise members of the organizations that constitute the Multi-Association Group ("MAG") – The National Rural Telecom Association, the National Telephone Cooperative Association, the Organization for the Promotion and Advancement of Small Telecommunications Companies and the United States Telecom Association. As such, those members of the OTIA are subject to the proposals made by the MAG in these proceedings. <sup>1</sup>

The remaining members of the OTIA, while not directly subject to the proposals outlined by MAG in these proceedings, are subject to the proposals of the Coalition for Affordable Local and Long Distance Service and the Commission's rules adopted in response to those proposals. In the Matter of Access Charge Reform and Price Cap Performance Review for Local Exchange Carriers, Sixth Report and Order, CC Docket Nos. 96-262 and 94-1; In the matter of Low-volume Long Distance Users, Report and Order, CC docket No. 99-249, In the Matter of Federal-State Joint Board On Universal Service, Eleventh Report and Order, CC Docket No. 96-45 (May 31, 2000).

With these Comments, the OTIA, for itself and on behalf of its affected members, expresses its support for the MAG Proposal filed in this matter on October 20, 2000, and urges the Commission to adopt the Proposal without modification and in its entirety.

Respectfully submitted,

THE OHIO TELECOMUNICATIONS INDUSTRY ASSOCIATION

By: Thomas & dool

Thomas E. Lodge

THOMPSON HINE & FLORY LLP

One Columbus

10 West Broad Street, Suite 700

Columbus, Ohio 43215-3435

(614) 469-3200

Its Attorneys